IN THE DRAWINGS

Applicant encloses an Annotated Sheet for Fig. 1 illustrating a minor correction.

Applicant also encloses a Replacement Sheet for Fig. 1 reflecting the correction.

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REMARKS

Claims 1-7 are pending in the application. Applicant amends Fig. 1 for a minor correction and amends claim 1 for clarification. Applicant refers to Fig. 4 and its corresponding description in the specification for an exemplary embodiment of and support for the claimed invention. No new matter has been added.

Applicant acknowledges with appreciation the Examiner's finding that claims 4-5 contain allowable subject matter, and respectfully submits that the provided reasons for allowability include only the Examiner's non-exhaustive interpretations, which should in no way limit the scope of the allowable claims. Applicant further submits that claim 1, from which claims 4-5 depend, is patentable over the reference cited against it, as demonstrated below. Accordingly, Applicant requests that the Examiner allow claims 4-5.

The Examiner objected to Fig. 1 for not labeling block 11 therein. Applicant encloses an Annotated Sheet and a Replacement Sheet for Fig. 1 reflecting a minor correction of adding the label "Layer-2 Switch" to block 11. Accordingly, Applicant respectfully requests that the Examiner withdraw the objection.

Claims 1 and 6-7 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 7,085,827 to Ishizaki et al.; and claims 2-3 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Ishizaki et al. in view of U.S. Patent Application Publication No. 2003/0189936 to Terrell et al. Applicant amends claim 1 in a good faith effort to clarify the invention as distinguished from the cited references, and respectfully traverses the rejections.

The Examiner relied upon the description of VPN routing in Ishizaki et al. as alleged disclosure of the claimed invention. In particular, the Examiner apparently relied upon the description of a virtual router adding a VLAN tag to received packets as alleged disclosure of the

claimed tag replacement feature. And the Examiner appeared to rely upon the VPN table 500 illustrated in Fig. 5 of Ishizaki et al. as alleged disclosure of the claimed lookup table.

As shown in Fig. 5 of Ishizaki et al., however, the VPN table described therein does not include any linked entries. Fig. 4 of the present application illustrates an exemplary embodiment of the claimed linked entries. As shown in Fig. 4, each entry of a destination search table is linked with its adjacent upstream and downstream entries. In other words, for each entry of the destination search key, the search result or the second column VLAN tag of the entry is set to the search key or the first column VLAN tag of the next downstream entry. For each entry of the destination search key, the search key or the first column VLAN tag of the entry is set to the search result or the second column VLAN tag of the previous upstream entry. Thus, these entries are linked with the respective adjacent downstream and upstream entries. As a result, a sequence of such linked entries—for example, a1-a8 in Fig. 4—of the destination search table is configured to define a user-specific path between the client side (VLANin) and the server side (VLANout).

Applicant, therefore, respectfully submits that Ishizaki et al., as cited and relied upon by the Examiner, fail to disclose the claimed lookup table that includes one or more linked pairs of tags and destination addresses.

In addition, the cited portions of Ishizaki et al. only include description of VR-A simply adding VLAN tags. Col. 6, lines 51-56 of Ishizaki et al. That is, VLAN tags are accumulated. As a result, the length of a packet increases in this system. Therefore, Ishizaki et al., as cited and relied upon by the Examiner, fail to disclose the claimed tag replacement and transmission part that replaces a tag of a received packet with a tag detected from a lookup table, which advantageously preserves the length of a packet as unchanged.

84227201_1

In other words, Ishizaki et al., as relied upon by the Examiner, fail to disclose,

> "[a] connection management apparatus for connecting a plurality of physically connectable network devices based on connection paths set for individual users, comprising:
> a client port connectable to the users via a network;
> a server port connectable to a server;
> a lookup table including one or more ***linked pairs*** of tags and destination addresses, each of said ***linked pairs*** indicating a user and a next destination of a received packet by using a tag attached to the received packet as a search key wherein said attached tag indicates a user and a destination; and
> a tag replacement and transmission part ***replacing*** a tag of the received packet with a tag detected from the lookup table and transmitting the resulting packet to a destination address detected from the lookup table;
> wherein a packet received from one of the users and the server is transmitted to one of the plurality of network devices and a packet received from one of the plurality of network devices is transmitted to one of the plurality of network devices, the server and the users," as recited in claim 1. (Emphasis added)

Accordingly, Applicant respectfully submits that claim 1, together with claims 6-7 dependent therefrom, is patentable over Ishizaki et al. for at least the above-stated reasons. The Examiner relied upon Terrell et al. as a combining reference to specifically address the additional features recited in dependent claims 2-3. As such, the addition of this reference would still have failed to cure the above-described deficiencies of Ishizaki et al., even assuming, arguendo, that such an addition would have been obvious to one skilled in the art at the time the claimed invention was made. Accordingly, Applicant respectfully submits that claims 2-3 are patentable over the cited references for at least the foregoing reasons.

In view of the remarks set forth above, this application is in condition for allowance which action is respectfully requested. However, if for any reason the Examiner should consider this application not to be in condition for allowance, the Examiner is respectfully requested to telephone the undersigned attorney at the number listed below prior to issuing a further Action.

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Any fee due with this paper may be charged to Deposit Account No. 50-1290.

Respectfully submitted,

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Docket No.: 100794-00541 (FUJI 20.904)
DTC:kc

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Annotated Sheet

FIG.1